

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Rodney Joseph Dyess
Candace Janette Dyess, Debtors**

**Case No. 25-50713-KMS
CHAPTER 13**

MOTION TO EXTEND AUTOMATIC STAY

COME NOW Debtors by and through their undersigned attorney, pursuant to 11 U.S.C. §362(c)(3)(B), and respectfully move this court to continue the automatic stay provided under 11 U.S.C. §362(a) as to all creditors, and in support thereof would show:

1. That this Court has jurisdiction over this matter pursuant to 11 U.S.C. §105(a), 28 U.S.C. §157(b)(1), and 28 U.S.C. §1334. This matter constitutes a core proceeding as defined by 28 U.S.C. §157(b)(2).
2. That on 05/14/2025, Debtors filed the petition for relief under Chapter 13 in the instant cause.
3. That on or about 3/13/2024, Debtors filed a Chapter 13 proceeding, case number 24-50343, and said case dismissed on 4/2/2025.
4. That debtors filed the instant case in good faith and only after a substantial change in the financial and personal affairs of the Debtor.
5. That this motion is not made for the purposes of delay, but in good faith.

WHEREFORE, PREMISES CONSIDERED, Debtors respectfully request the Court continue the stay under 11 U.S.C. §362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief from stay is granted under §362(d). Debtors further requests any additional relief, general or specific, to which they may be entitled.

Respectfully submitted,

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:
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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Motion to Extend Automatic Stay and Declaration were forwarded on May 16, 2025, to:

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.